1 2 3 4 5 6 7 8	Erika Heath (SBN 304683) (erika@heathlegal.com) ERIKA HEATH, ATTORNEY AT LAW 369 Pine Street, Suite 410 San Francisco, CA 94104 Tel: (415) 426-7850  Attorneys for Plaintiff OSKAR LIZARRAGA-DAVIS	James K. Schultz (SBN 309945) Debbie P. Kirkpatrick (SBN 207112) SESSIONS, ISRAEL & SHARTLE, LLP 1545 Hotel Circle South, Suite 150 San Diego, CA 92108-3426 Tel: (619) 758-1891 Fax: (877) 334-0661 jschultz@sessions.legal dkirkpatrick@sessions.legal Attorneys for Defendant TRANSWORLD SYSTEMS, INC.
10	UNITED STATES DISTRICT COURT	
11	NORTHERN DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
12		]
13	OSKAR LIZARRAGA-DAVIS,	Case No. 5:18-cv-04081-BLF
	Plaintiff,	JOINT STIPULATION RE: DISCOVERY
14	V.	DOCUMENTS AND FACTS
15		
16	TRANSWORLD SYSTEMS, INC.;  Defendant.	
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20	IT IS HEREBY AGREED AND STIPULATED among the parties to this action, by and	
21	through their counsel, for purposes of the above-styled action, that:	
22	1. The action and result codes produced by TSI (TSI0542-TSI0551) are true and	
23	correct copies of the action and result codes applicable to the account records in this case	
24	(TSI0169-TSI0259).	
25	2. In lieu of further discovery on the issue, TSI agrees that it will not contest the	
26	conclusion in the Consumer Financial Protection Bureau's Consent Order with TSI that the	
27	approximate number of lawsuits filed between November 1, 2014 and April 25, 2016 on behalf	
28	approximate number of fawsuits fried between I	November 1, 2017 and April 23, 2010 on belian
		1

1	of the National Collegiate Student Loan Trusts is approximately 37,689. Other than the		
2	agreement not to contest the number of lawsuits, TSI does not admit to or agree with any of the		
3	other findings or conclusions in the CFPB's Consent Order and this stipulation is limited only to		
4	the approximate number of lawsuits filed on behalf of the National Collegiate Student Loan		
5	Trusts.		
6			
7			
8	Dated: June 7, 2021 ERIKA HEATH, ATTORNEY AT LAW		
9	/s/ Erika Heath		
10	Erika A. Heath		
11	Attorney for Plaintiff OSKAR LIZARRAGA-DAVIS		
11 12	USKAR LIZARRAGA-DAVIS		
	Dated: June 7, 2021 SESSIONS, ISRAEL & SHARTLE LLP		
13	SESSIONS, ISMAEL & SIMMELE BEI		
14	/s/ James Schultz James K. Schultz		
15	Debbie P. Kirkpatrick Attorney for Defendant TRANSWORLD SYSTEMS, INC.		
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17	TRANSWORLD STSTEMS, INC.		
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21	L.R. 5-1 Attestation  Pursuant to L.R. 5-1(i)(3) regarding signatures, I, Erika A. Heath, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of June, 2021, at San Francisco, California.		
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26	By: <u>/s/ Erika Heath</u> Erika A. Heath		
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